

**Fill in this Information to identify the case:**

Debtor 1 ZB Company, Inc.  
First Name Middle Name Last Name

Debtor 2  
(Spouse, if filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: District of Delaware

Case Number: 03-13672

**Form 1340 (12/19)****APPLICATION FOR PAYMENT OF UNCLAIMED FUNDS****1. Claim Information**

For the benefit of the Claimant(s)<sup>1</sup> named below, application is made for the payment of unclaimed funds on deposit with the court. I have no knowledge that any other party may be entitled to these funds, and I am not aware of any dispute regarding these funds.

Note: If there are joint Claimants, complete the fields below for both Claimants.

Amount:	\$10,664.93
Claimant's Name:	Dilks & Knopik, LLC as assignee to Caruso Affiliated Holdings, LLC
Claimant's Current Mailing Address, Telephone Number, and Email Address:	35308 SE Center St Snoqualmie, WA 98065 (425) 836-5728 admin@dilksknopik.com

**2. Applicant Information**

Applicant<sup>2</sup> represents that Claimant is entitled to receive the unclaimed funds because (*check the statements that apply*):

- ☐ Applicant is the Claimant and is the Owner of Record<sup>3</sup> entitled to the unclaimed funds appearing on the records of the court.
- ☒ Applicant is the Claimant and is entitled to the unclaimed funds by assignment, purchase, merger, acquisition, succession or by other means.
- ☐ Applicant is Claimant's representative (*e.g.*, attorney or unclaimed funds locator).
- ☐ Applicant is a representative of the deceased Claimant's estate.

**3. Supporting Documentation**

- ☒ Applicant has read the court's instructions for filing an Application for Unclaimed Funds and is providing the required supporting documentation with this application.

<sup>1</sup> The Claimant is the party entitled to the unclaimed funds.

<sup>2</sup> The Applicant is the party filing the application. The Applicant and Claimant may be the same.

<sup>3</sup> The Owner of Record is the original payee.

#### 4. Notice to United States Attorney

- ☒ Applicant has sent a copy of this application and supporting documentation to the United States Attorney, pursuant to 28 U.S.C. § 2042, at the following address:

Office of the United States Attorney  
District of Delaware  
1313 N. Market Street  
Wilmington, DE 19801

#### 5. Applicant Declaration

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: April 1, 2022

  
\_\_\_\_\_  
Signature of Applicant  
Brian J Dilks – Member  
Dilks & Knopik, LLC

35308 SE Center Street  
Snoqualmie, WA 98065  
428-836-5728 x123  
admin@dilksknopik.com

#### 5. Co-Applicant Declaration (if applicable)

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature of Co-Applicant (if applicable)

\_\_\_\_\_  
Printed Name of Co-Applicant (if applicable)

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

#### 6. Notarization

STATE OF WASHINGTON

COUNTY OF KING

This Application for Unclaimed Funds, dated April 1, 2022 was subscribed and sworn to before me this 1st day of April, 2022 by Brian J Dilks who signed above and is personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument. WITNESS my hand and official seal.

(SEAL)

Notary Public: 

Matthew Zettley

My commission expires: February 19, 2026



#### 6. Notarization

STATE OF \_\_\_\_\_

COUNTY OF \_\_\_\_\_

This Application for Unclaimed Funds, dated \_\_\_\_\_ was subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ by \_\_\_\_\_

\_\_\_\_\_  
who signed above and is personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument. WITNESS my hand and official seal.

(SEAL)

Notary Public \_\_\_\_\_

My commission expires: \_\_\_\_\_

## CERTIFICATE OF SERVICE

In accordance with 28 U.S.C. § 2042, the undersigned hereby certifies that on the date designated below, a true and correct copy of the foregoing application with all required documentation was mailed to:

United States Attorney for District of Delaware  
1313 N. Market Street  
Wilmington, DE 19801

Names and addresses of all other parties served:

ZB Company, Inc.  
Debtor  
2520 Renaissance Boulevard  
King of Prussia, PA 19406

Rebecca L. Booth  
Debtors Attorney  
1701 Market Street  
Philadelphia, PA 19103

Jeffrey L. Burtch  
Trustee  
P.O. Box 549  
Wilmington, DE 19899

Caruso Affil Holdgs The Grove Katten Muchin  
Zavis Rosenman  
Original Claimant  
2029 CENTURY PARK EAST SUITE 2600  
LOS ANGELES, CA 90067

Caruso Affiliated Holdings, LLC  
Assignee  
101 The Grove Dr  
Los Angeles, CA 90036

US Trustee  
844 King Street  
Suite 2207  
Wilmington, DE 19801

Date: April 1, 2022



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Brian J Dilks - Member  
Dilks & Knopik, LLC  
35308 SE Center Street  
Snoqualmie, WA 98065



**Explanation of Supporting Documentation  
for  
Application for Payment of Unclaimed Funds**

The claimant did not receive the dividend check in the above case for the following reason:

Dividends were not collected by the creditor, Caruso Affil Holdgs.

Caruso Affiliated Holdings, LLC has assigned the unclaimed funds and its claim to Dilks & Knopik LLC as evidenced by the attached Assignment Agreement and/or the Transfer of Claim filed on 4/1/22 (Docket #2733).

Date: April 1, 2022



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Brian J Dilks - Member  
Dilks & Knopik, LLC  
35308 SE Center Street  
Snoqualmie, WA 98065

**Fill in this Information to identify the case:**

Debtor 1                      ZB Company, Inc.  
                                    First Name              Middle Name              Last Name

Debtor 2  
(Spouse, if filing)              \_\_\_\_\_  
                                    First Name              Middle Name              Last Name

United States Bankruptcy Court for the:      District of Delaware

Case Number:      03-13672

**NOTICE OF HEARING**

Dilks & Knopik, LLC has filed a motion for Release of Unclaimed Funds.

A hearing regarding this motion is scheduled for 5/18/22 at 2:00 PM:

United States Bankruptcy Court  
824 Market Street, 5<sup>th</sup> Floor, Courtroom #4  
Wilmington, DE 19801

Objections are due on or before 5/11/2022

April 1, 2022



Brian J Dilks - Member  
Dilks & Knopik, LLC  
35308 SE Center Street  
Snoqualmie, WA 98065

# U.S. Courts Unclaimed Funds Locator

[Home](#) [About](#)

[Edit Search](#)

Court / DEB

Case Number 03-13672 Page Total \$10,664.93

Last/Business Name First Name

Zb Company, Inc.

Creditors | 1

Court	Creditor Name	Amount
DEB	Caruso Affili Holdings The Grove-Katten Muchin Zavis Rosenman	\$10,664.93

# Dilks & Knopik

## CERTIFICATE OF LLC RESOLUTION

The undersigned Members of Dilks & Knopik, LLC, an LLC, duly organized under the laws of Washington (hereinafter "The LLC"), hereby certify that the following resolutions were duly adopted by said Members of The LLC on June 7<sup>th</sup>, 2002 and that such resolutions have not been modified or rescinded as of the date hereof:

RESOLVED, that Brian J Dilks, Caryn M Dilks f/k/a Caryn M Knopik, Andrew T. Drake and Jeffrey Hudspeth, is hereby authorized and directed for and on behalf of The LLC to execute all legal documents as approved by him/her as being in the best interests of The LLC; and to take any and all further actions which may be necessary or appropriate to commence and complete said construction in such a manner as being, in his/her opinion, in the best interests of the LLC.

RESOLVED, that this action may be executed in counterparts and by facsimile signatures, each of which shall be deemed an original and all of which together shall constitute one action.

IN WITNESS WHEREOF, the undersigned has executed this instrument as of this 5<sup>th</sup> day of

January, 20 22

Brian J Dilks  
Brian J Dilks – Member

Date: 1/5/22

Subscribed and sworn to me this

1/5/2022

Notary Signature Ryan L Bell

My Commission Expires: 6/19/2025

Caryn M Dilks  
Caryn M Dilks f/k/a Caryn M Knopik – Member

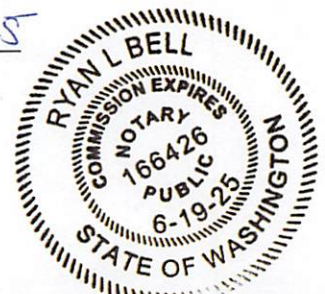
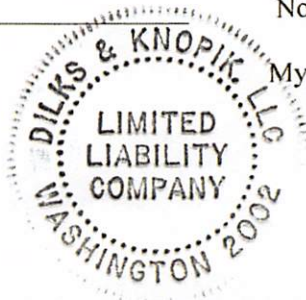
Date: 1/5/2022

Subscribed and sworn to me this

1/5/2022

Notary Signature Ryan L Bell

My Commission Expires: 6/19/2025







**WASHINGTON**  
**Secretary of State**  
Corporations & Charities Division

Filed  
Secretary of State  
State of Washington  
Date Filed: 01/05/2022  
Effective Date: 01/05/2022  
UBI #: 602 211 447

## Annual Report

### BUSINESS INFORMATION

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Business Name:  
**DILKS & KNOPIK, LLC**

UBI Number:  
**602 211 447**

Business Type:  
**WA LIMITED LIABILITY COMPANY**

Business Status:  
**ACTIVE**

Principal Office Street Address:  
**35308 SE CENTER ST, SNOQUALMIE, WA, 98065-9216, UNITED STATES**

Principal Office Mailing Address:

Expiration Date:  
**06/30/2023**

Jurisdiction:  
**UNITED STATES, WASHINGTON**

Formation/Registration Date:  
**06/07/2002**

Period of Duration:  
**PERPETUAL**

Inactive Date:

Nature of Business:  
**OTHER SERVICES, ANY LAWFUL PURPOSE**

### REGISTERED AGENT [RCW 23.95.410](#)

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Registered Agent Name	Street Address	Mailing Address
BRIAN DILKS	28431 SE PRESTON WAY, ISSAQUAH, WA, 98027-0000, UNITED STATES	28431 SE PRESTON WAY, ISSAQUAH, WA, 98027-0000, UNITED STATES

### PRINCIPAL OFFICE

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Phone:  
**4258365728**

Email:  
**DK@DKLLC.COM**



Street Address:  
35308 SE CENTER ST, SNOQUALMIE, WA, 98065-9216, USA  
Mailing Address:

## GOVERNORS

Title	Type	Entity Name	First Name	Last Name
GOVERNOR	INDIVIDUAL		BRIAN	DILKS
GOVERNOR	INDIVIDUAL		CARYN	DILKS

## NATURE OF BUSINESS

- OTHER SERVICES
- ANY LAWFUL PURPOSE

## EFFECTIVE DATE

Effective Date:  
01/05/2022

## CONTROLLING INTEREST

1. Does this entity own (hold title) real property in Washington, such as land or buildings, including leasehold improvements?  
NO
2. In the **past 12 months**, has there been a transfer of at least 16-2/3 percent of the ownership, stock, or other financial interest in the entity?  
NO
  - a. If "Yes", in the **past 36 months**, has there been a transfer of controlling interest (50 percent or greater) of the ownership, stock, or other financial interest in the entity?  
NO
3. If you answered "Yes" to question 2a, has a controlling interest transfer return been filed with the Department of Revenue?  
NO

You **must** submit a Controlling Interest Transfer Return form if you answered "yes" to questions 1 and 2a.

Failure to report a Controlling Interest Transfer is subject to penalty provisions of [RCW 82.45.220](#).

For more information on **Controlling Interest**, visit [www.dor.wa.gov/REET](http://www.dor.wa.gov/REET).

## RETURN ADDRESS FOR THIS FILING

Attention:  
Email:  
Address:

## UPLOAD ADDITIONAL DOCUMENTS

Do you have additional documents to upload? No

## EMAIL OPT-IN

☐ By checking this box, I hereby opt into receiving all notifications from the Secretary of State for this entity via email only. I

acknowledge that I will no longer receive paper notifications.

## AUTHORIZED PERSON

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☒ I am an authorized person.

Person Type:

**INDIVIDUAL**

First Name:

**BRIAN**

Last Name:

**DILKS**

Title:

**MEMBER**

☒ This document is hereby executed under penalty of law and is to the best of my knowledge, true and correct.

## Dilks & Knopik

*When Success Matters*

**Brian Dilks**  
Managing Member

35308 SE Center Street  
Snoqualmie, WA 98065  
Ph. 877-836-5728 x 101  
Fx. 877-209-8249  
brian.dilks@dilksknopik.com

www.dilksknopik.com



## Dilks & Knopik

*When Success Matters*

**Caryn Knopik**  
Managing Member

35308 SE Center Street  
Snoqualmie, WA 98065  
Ph. 877-836-5728 x 102  
Fx. 877-209-8249  
caryn.knopik@dilksknopik.com

www.dilksknopik.com



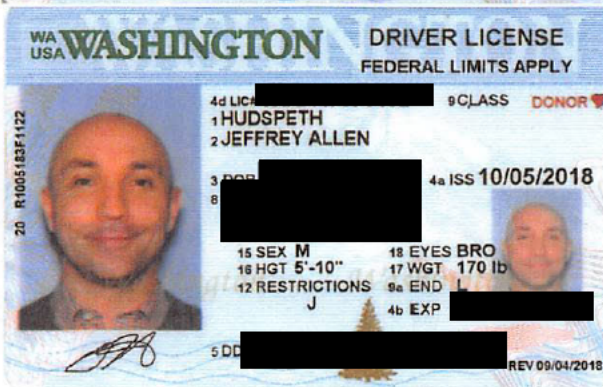
## Dilks & Knopik

*When Success Matters*

**Jeff Hudspeth**  
Vice President - Accounts

35308 SE Center Street  
Snoqualmie, WA 98065  
Ph. 877-836-5728 x 104  
Fx. 877-209-8249  
jeff.hudspeth@dilksknopik.com

www.dilksknopik.com

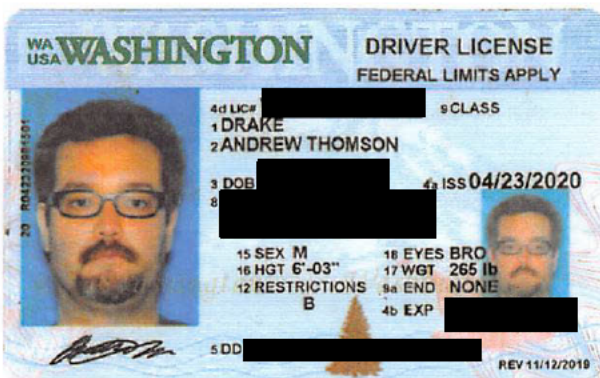


## Dilks & Knopik

*When Success Matters*

**Andrew Drake**  
Vice President - Operations

35308 SE Center Street  
Snoqualmie, WA 98065  
Ph. 877-836-5728 x 123  
Fx. 877-209-8249  
andrew.drake@dilksknopik.com  
www.dilksknopik.com



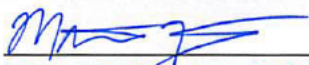
BBB  
accredited  
since 2003







Dilks & Knopik

On this 4<sup>th</sup> day of April, 2022, I certify  
that the preceding or attached document titled  
(Assignment Agreement), (2 pages) is a true,  
accurate and complete copy of the original being held  
at 35308 SE Center Street, Snoqualmie, WA 98065  
  
Matthew Zettley - Notary Public  
My commission expires: February 19, 2026

### Assignment Agreement

This Assignment Agreement (the "Agreement") is entered into as of March 29, 2022 (the "Effective Date") by and between Dilks & Knopik, LLC, with a principal place of business at 35308 SE Center Street, Snoqualmie, WA 98065, (the "Assignee") and Caruso Affiliated Holdings, LLC with an address of 101 The Grove Dr, Los Angeles, CA 90036 (the "Assignor").


1. Assignor is/was a creditor in the ZB Company, Inc. case (03-13672) as filed in the District of Delaware (the "Case"). As a creditor in the Case, Assignor was entitled to distribution of funds from the assets of the Bankruptcy Estate in the approximate amount of \$10,664.93 (the "Funds"). Remittance to Assignor was not successful, and pursuant to Federal Rule of Bankruptcy Procedure 3011 and 11 U.S.C. 347, the Funds were deposited into the Registry of the Court. The Funds then being subject to withdrawal in accordance with 28 U.S.C. 2042.
2. Assignor not desirous of attempting collection of the Funds, nor wishing to incur the time and expense of such collection, does hereby wish and does assign, and convey to the Assignee, for good and valuable consideration, all of Assignor's rights, title and interest in the Funds, without the presence of undue influence or coercion.

NOW THEREFORE, in consideration of mutual obligations, covenants, representations, and warranties herein, the parties agree as follows:


3. **Assets Assigned:** The assets herein assigned to Assignee are those stated in paragraph 1 above, that collectively are the Funds held for the benefit of Assignor by the Clerk of the Court of the court identified in paragraph 1 in the Unclaimed Funds Registry.
4. **Consideration:** The consideration herein given by Assignee to Assignor shall be the sum \$            which sum shall be remitted to Assignor. A check will be issue to the Assignor for the above stated amount prior to the claim/application/motion is submitted to court. **In the event Assignee recovers an amount over and above the Funds then Assignor shall be entitled to            % of the additional amount recovered.**
5. **Assignor Warranty.** Assignor represents and warrants to Assignee that no payment or other distribution has been received by or on behalf of Assignor in full or partial satisfaction of the assigned asset or assigned rights, that Assignor has not sold or assigned, and shall not sell or further assign the rights, in whole or in part, herein assigned to Assignee to any other third party; and that Assignor shall cooperate with Assignee by providing or executing any additional information or document(s), without delay, deemed necessary for the recovery of the assigned Funds by Assignee, failure to do so shall be a breach of this Agreement.
6. **Power of Attorney:** To the extent necessary under applicable law, the Assignor does hereby appoint for the limited purpose of collection of the Funds and fulfillment of Assignor's obligation(s) under this Agreement, Dilks and Knopik, LLC as its attorney-in-fact.
7. This Agreement constitutes the entire agreement and understanding between the parties with respect to the subject matter above.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed as of the day and year first written above.

Assignor:

  
Caruso Affiliated Holdings, LLC  
Greg Rosa - Authorized Signatory

Assignee:

  
Dilks & Knopik, LLC  
Andrew T. Drake - Authorized Signatory



# Dilks & Knopik

## NOTICE OF ASSIGNMENT

For good and valuable consideration, the undersigned, Caruso Affiliated Holdings, LLC ("Assignor"), hereby, assigns, conveys and transfers over and unto Dilks & Knopik, LLC ("Assignee"), any and all of right, title and interest in and to the below referenced funds/claim(s).

The Assigned funds/claim(s):

Debtor: ZB Company, Inc.  
Court: United States Bankruptcy Court - District of Delaware  
Case Number: 03-13672  
Chapter: 7  
Claim # 220

FUNDS/CLAIM(S) ARE BEING ASSIGNED "AS-IS, WHERE-IS" WITH NO WARRANTIES OR REPRESENTATIONS WHATSOEVER, EXCEPT AS EXPRESSLY PROVIDED IN THE ASSIGNMENT AGREEMENT, INCLUDING, WITHOUT LIMITATION, WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

IN WITNESS WHEREOF, the parties hereto have caused this notice of assignment to be executed as of the Tuesday, March 29, 2022.

Caruso Affiliated Holdings, LLC

  
\_\_\_\_\_  
Greg Rosa - Authorized Signatory

**GREG ROSA**

VICE PRESIDENT

FINANCIAL PLANNING & ANALYSIS

**CARUSO**

101 THE GROVE DRIVE

LOS ANGELES, CA 90036

☎ 323.900.8446 | ☎ 626.260.6939

GROSA@CARUSO.COM

CARUSO.COM

TITLE & Address Proof

KATTEN MUCHIN ZAVIS ROSENMAN  
Thomas J. Leanse (SBN: 084638)  
Dustin P. Branch (SBN: 174909)  
2029 Century Park East, Suite 2600  
Los Angeles, CA 90067-3012  
310.788.4400  
310.788.4471

Attorneys for Creditors  
The Macerich Company, The Forbes Company,  
RREEF Management Co., Portland Investment Company of America,  
Caruso Affiliated Holdings, and The Related Companies, LP

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
<u>ZB COMPANY, INC., et al.,</u>	)	Case No. <u>03-13672</u> (JBR)
	)	(Jointly Administered)
Debtors.	)	
	)	
	)	<b>STATEMENT PURSUANT TO</b>
	)	<b>FEDERAL RULE OF BANKRUPTCY</b>
	)	<b>PROCEDURE 2019</b>

I, Dustin P. Branch, declare and state as follows:

1. I am an attorney licensed to practice law and am counsel with the law firm of Katten Muchin Zavis Rosenman ("KMZR"). I have personal knowledge of the facts set forth herein and if called as a witness could and would competently testify thereto.

2. Thomas J. Leanse, a partner with KMZR, and I, are the attorneys primarily responsible for representing the following creditors (collectively referred to as the "Landlords") in connection with the above entitled case:

a. The Macerich Company ("Macerich"), c/o Stephen L. Spector, Esq., 401 Wilshire Boulevard, Suite 700, Santa Monica, CA 90401, managing agent for the landlords of Chesterfield Towne Center, Richmond, VA, Redmond Towne Center, Redmond, WA, and Westside Pavilion, Los Angeles, CA.

**KMZ Rosenman**  
KATTEN MUCHIN ZAVIS ROSENMAN  
3029 Century Park East, Suite 2000  
Los Angeles, CA 90067-3012  
310.788.4400 office 310.788.4477 fax

b. The Forbes Company ("Forbes"), c/o Lee Hunrath, 100 Galleria Office Center, Suite 427, Southfield, MI 48034, managing agent for the landlord of Somerset Collection North, Troy, MI.

c. RREEF Management Co ("RREEF"), c/o Gary Owca, 6759 Sierra Court, Suite E, Dublin, CA 94568, as former managing agent for the landlord of Hacienda Crossings, Dublin, CA.

d. Portland Investment Company of America ("Portland"), c/o Bruce Goren, 10866 Wilshire Blvd., 11th Floor, Los Angeles, CA 90024, managing agent for the landlord of Plaza at Greenville Mall, Greenville, SC.

e. Caruso Affiliated Holdings ("Caruso"), c/o Dan Burgner, 101 The Grove Drive, Los Angeles, CA 90036, as managing agent for the landlord of The Grove, Los Angeles, CA.

f. The Related Companies, LP ("Related"), c/o Robin Garguilo, 625 Madison Avenue, 9th Floor, New York, NY 10022, as managing agent for the landlord of Palladium at City Place, West Palm Beach, FL.

3. The Landlords currently hold or will hold unsecured pre-petition claims, unsecured rejection claims and/or postpetition administrative claims for unpaid rent and other charges. The full amount of each of the Landlords' claims is undetermined at this time.

4. The Landlords have all retained KMZR to represent them with respect to their interests in connection with the above captioned case. All parties are being billed on a monthly basis. All parties are aware of and have consented to KMZR's joint representation of other shopping center clients in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of January, 2004, at Los Angeles, California.

/s/ Dustin P. Branch  
Dustin P. Branch





PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Katten Muchin Zavis Rosenman, 2029 Century Park East, Suite 2600, Los Angeles, California 90067.

On January 9, 2004, I served the foregoing document described as **STATEMENT PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019** on the interested parties in this action by placing a true and correct copy of this document thereof, enclosed in a sealed envelope, addressed as follows:

Debtor's Counsel:Office of the U.S. Trustee:

Mark D. Collins, Esq.  
Richards, Layton & Finger, P.A.  
One Rodney Square  
P.O. Box 551  
Wilmington, DE 19899  
(Via Mail)

Office of the U.S. Trustee  
844 King Street, Suite 2313  
Lockbox 35  
Wilmington, DE 19801  
(Via Mail)

(BY MAIL) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on January 9, 2004, at Los Angeles, California.

/s/ Cora Sagara

Cora Sagara

